INTEGRATIVE THERAPEUTICS INC.









NF Formulas

PhytoPharmica

Tyler Encapsulations

Vitaline Formulas

JUN 2 0 2003

June 16, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 811
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

Notification of structure-function claims

Dear Sir:

This letter is to notify you that the following product manufactured, packed, and/or distributed by Tyler Encapsulations (9725 SW Commerce Circle, Suite A6, Wilsonville, OR 97070) has literature that contains a statement provided for by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Tyler wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and complies with section 403(r)(6) of the act.

Product Name	Statement	Ingredient(s) to which claim refers
Vision Complex	"With Lutein and Zeaxanthin for support of vision and eye health*"	Vitamin A (as Beta-Carotene)
		Vitamin C (as Ascorbic Acid)
		Vitamin E (as d-Alpha-Tocopheryl Succinate
		and Mixed Tocopherols)
		Riboflavin
		Folic Acid
		Vitamin B12 (as Cyanocobalamin)
		Zinc (as L-OptiZinc®)
		Selenium (as L-Selenomethionine)
		Copper (as Copper Citrate)
		Manganese (as Manganese Citrate)

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84822

Product Name

Statement

Ingredient(s) to which claim refers (cont'd)

Taurine

Bilberry Fruit Extract (Vaccinium myrtillus)

25% Anthocyanins

Lutein

Zeaxanthin

I certify that the information contained in this notice is complete and accurate, and that Tyler has substantiation that the statement is truthful and not misleading.

Mario Roxas, N.D.

Director of Technical Services

INTEGRATIVE THERAPEUTICS INC.









NF Formulas

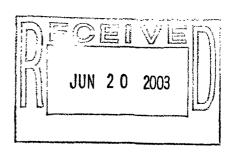
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Product Name	Statement	Ingredient(s) to which Claim refers
Vision Complex	"Vision Complex delivers a potent combination of antioxidants and other targeted nutrients for the support of eye health and visual acuity*."	Vitamin A (as Beta-Carotene)
		Vitamin C (as Ascorbic Acid)
		Vitamin E (as d-Alpha-Tocopheryl Succinate
		and Mixed Tocopherols)
		Riboflavin
		Folic Acid
		Vitamin B12 (as Cyanocobalamin)
		Zinc (as L-OptiZinc®)
		Selenium (as L-Selenomethionine)
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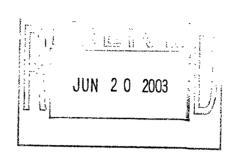
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Product Name	Statement	ingredient(s) to which claim refers
Vision Complex	"The most complete formula of targeted nutrients for the eyes, it contains high amounts of lutein and is the first practitioner formula with zeaxanthin*."	Vitamin A (as Beta-Carotene)
		Vitamin C (as Ascorbic Acid)
		Vitamin E (as d-Alpha-Tocopheryl Succinate
		and Mixed Tocopherols)
		Riboflavin
		Folic Acid
		Vitamin B12 (as Cyanocobalamin)
		Zinc (as L-OptiZinc®)
		Selenium (as L-Selenomethionine)
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Product Name

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